



Bonding options for the H&B Mine, permit S/019/0063

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James.

To follow up on our phone conversation, below is what I had been writing up the last couple of days, with some of the stuff we just talked about taken out to make it shorter.

Since we don't really know how many acres you would like to bond yet, you can use the table in the Escalation Notice to calculate what the bond would be for any given acreage you choose to cover. For bonding purposes, partial acres are rounded up to the next full acre. For example, if you wanted to permit 2.5 acres, it would be bonded at a full 3 acres. As you can also see by the table, a 5-year escalation is not significantly more costly than a 3-year escalation and would be worth considering so you do not have to go through this exercise as frequently.

We also discussed that if you were going to reduce your bonded acreage, you would need to submit a revision to the NOI to the Division and notify SITLA of your intentions. You can talk it over with Jerry Mansfield at SITLA to see if they would let you improve the existing road to make it suitable for your use with the understanding that it would be left that way when you finally are done mining.

I also mentioned possibly changing the sequencing of working the half-acre blocks. This is shown on the attached PDF. This may allow you to work your way out of the permit area, reclaiming each completed block as you move out. As each block is reclaimed, the regrading portion of the bond can be rolled over to the next block to be disturbed in the sequence with a minimal amount (~15%/block) retained until successful revegetation has been achieved. In this manner, there would be a minimum amount of bond money required to be tied up through the life of the mine.

At a minimum, the mine needs to have enough bond in place for all of the current disturbed area, plus any area that is anticipated to be disturbed in the near future. As stated in the Bond Escalation Notice, there is currently 1.25 acres of disturbance, so the minimum amount of acreage to be bonded would be 2.0 acres. You may want to consider permitting 3 acres to give yourself room for turn-around areas, but you might be able to figure out something where 2 acres would be enough.

While your surveyors are out there, can you have them survey the outer boundary of those 10 half-acre blocks shown in your NOI? We don't need each half-acre block, just the outer perimeter of the whole group. I could eyeball it in GoogleEarth, but it wouldn't be very accurate. We would like to have a GIS shape file to overlay on our maps. If you have any questions on that, let me know. We don't require that yet, but the Division is moving in that direction in the near future as we incorporate GIS more into our process.

Thanks for your attention to everything and I look forward to talking with you in the future.

Mike Bradley Environmental Scientist III / Reclamation Specialist Utah Division of Oil, Gas and Mining M-F 7:30-4:30 801-538-5332